

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION

BOBBY GARRISON,

PLAINTIFF,

vs.

MONTGOMERY COUNTY BOARD OF
EDUCATION, ET AL.,

DEFENDANTS.

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* CASE NO.: 2:05-cv-549-A
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PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT

COMES NOW Bobby Garrison in the above styled cause and moves this Honorable Court to deny Defendants' Motion for Summary Judgment. As grounds therefore, the Plaintiff avers that there is a genuine issue of material fact to be submitted to a jury of Plaintiff's peers, and the Defendants are not due judgment as a matter of law, as to any claims made by the Plaintiff. In support of their response, Plaintiff relies on the following:

A. All Exhibits, attached to this motion and denoted as follows:

Exhibit "A" Plaintiff's Complaint

Exhibit "B" Defendants' Answer

Exhibit "C" Defendants' Memorandum in Support of Defendants'
Motion for Summary Judgment

Exhibit "D" Employment Notice

Exhibit "E" Deposition of Michael Ray Strength

Exhibit "F" Excerpts from Deposition of Bobby Garrison

Exhibit "G" Affidavit of Bobby Garrison

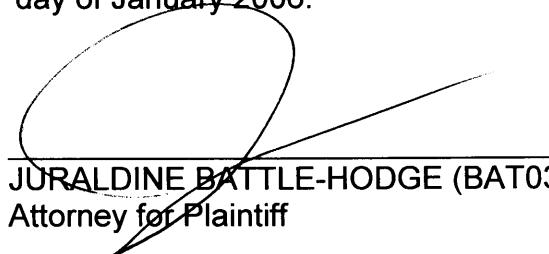
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Exhibit "H" Plaintiff's letter dated December 1, 2003.

Exhibit "I" Charge of Discrimination

WHEREFORE, THE PREMISIES CONSIDERED, Plaintiff respectfully requests that this Honorable Court deny Defendants' Motion for Summary Judgment, and allow this cause to move forward and be heard by a jury of Plaintiffs' peers.

Respectfully submitted this the 5th day of January 2006.


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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of January 2006, I filed foregoing document and the following counsels of record will receive Efile notice and by placing a copy of the same in the U.S. Mail, First Class postage prepaid, addressed as follows:

Elizabeth Brannen Carter
Jayne Leslie Harrell
James R. Seale
Hill, Hill, Carter, Franco, Cole & Black, P.C.
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Of Counsel

